

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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VALERIE A. SCHER AND PRESTON S. SCHER, :

Plaintiffs, :

vs. :

SANDALS RESORTS INTERNATIONAL, LTD., :
AND UNIQUE VACATIONS, INC., :

Defendants. :
----- X

Civ. No. 07-3847

**DEFENDANTS' RULE 26
INITIAL DISCLOSURES**

Defendants, in accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedures, as and for their Initial Disclosure, state as follows:

GENERAL STATEMENT

Defendants do not intend to disclose information that is privileged or is otherwise immune from discovery. Disclosure of any information protected by the attorney-client privilege, work-product doctrine or any other applicable privilege, except pursuant to a specific written agreement covering such information, shall be deemed inadvertent. Inadvertent disclosure of any such information shall not constitute a waiver or prejudice of any privilege or any other ground for objecting to discovery with respect to any such information nor shall such inadvertent disclosure waive or prejudice the right of Defendants to object to the use of any such information during this or any subsequent proceeding.

The information provided herein is based on the best information available to Defendants as of this date. Defendants reserve the right to modify, amend and/or supplement this disclosure. Defendants' disclosure shall not constitute an admission by them that the information is properly discoverable or admissible at trial, and shall not constitute a waiver of any objection which might otherwise be made to the disclosure of such information.

Defendants will produce responsive, non-privileged documents to the extent such documents exist and are in Defendants possession, custody and control, at the office of Defendants undersigned counsel at 7 Times Square, New York, NY 10036, at a date and time mutually convenient to the parties' respective counsel.

- The name and, if known, the address and telephone member of each individual likely to have discoverable information that the disclosing party may use to support its claims on defenses, unless solely for impeachment, identifying the subjects of the information.

- Clive Edwards - Hotel Manager, Sandals Royal Caribbean
Sandals Royal Caribbean
P.O. Box 167
Montego Bay, Jamaica
- Fiona Pottinger - On Duty Manager, Sandals Royal Caribbean
Sandals Royal Caribbean
P.O. Box 167
Montego Bay, Jamaica
- Jason Lawson - Bar Supervisor
Sandals Royal Caribbean
P.O. Box 167
Montego Bay, Jamaica
- Merlin Wilson - Nurse
Sandals Royal Caribbean
P.O. Box 167
Montego Bay, Jamaica
- A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.
 - Incident Report and Witness Statements
- A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.
 - Defendants do not seek any damages.
- For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.
 - A redacted copy of defendant's liability insurance policy will be made available for inspection.

Dated: August 6, 2007

DAY PITNEY LLP
Attorneys for Defendants

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